



U.S. EPA Region III  
RCRA Programs Branch  
Pennsylvania Section ( 3 HW51 )  
841 Chestnut Building  
Philadelphia, Pa. 19107

February 23, 1994

**RECEIVED**  
PA/DC SECTION

MAR 2 1994

Dear Sir/Madam

**EPA REGION III**

Enclosed please find an updated EPA Form 8700-12 ( Notification of Regulated Waste Activity ) for Aristech Chemical Corporation,s Neville Island Facility.

Should you have any questions concerning information provided, I can be reached at (412) 778-3308.

Sincerely,

Eugene F. Turoczy  
Environmental & Industrial  
Hygiene Technician

enclosures

cc: PA DER

Southwest Regional Office  
400 Waterfront Drive  
Pittsburgh, Pa. 15222-4745  
File

RECEIVED

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



# Notification of Regulated Waste Activity

United States Environmental Protection Agency

PA/Date Received  
(For Official Use Only)

MAR 2 1994

## I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒B. Subsequent Notification  
(complete item C)

C. Installation's EPA ID Number

P A D 0 0 0 8 2 4 7 3 0

## II. Name of Installation (Include company and specific site name)

A R I S T E C H C H E M I C A L C O R P O R A T I O N

## III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

N E V I L L E I S L A N D P L A N T

Street (continued)

2 0 0 N E V I L L E R O A D

City or Town

State

ZIP Code

P I T T S B U R G H P A 1 5 2 2 5 -

County Code

County Name

0 0 3 A L L E G H E N Y

## IV. Installation Mailing Address (See instructions)

Street or P.O. Box

2 0 0 N E V I L L E R O A D

City or Town

State

ZIP Code

P I T T S B U R G H P A 1 5 2 2 5 -

## V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

(first)

K E R K E N T Z E S S T A N L E Y

Job Title

Phone Number (area code and number)

P L A N T M A N A G E R 4 1 2 - 7 7 8 - 3 3 0 3

## VI. Installation Contact Address (See instructions)

A. Contact Address

Location

Mailing

☒

B. Street or P.O. Box

City or Town

State

ZIP Code

- - - - -

## VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

A R I S T E C H C H E M I C A L C O R P O R A T I O N

Street, P.O. Box, or Route Number

6 0 0 G R A N T S T R E E T

City or Town

State

ZIP Code

P I T T S B U R G H P A 1 5 2 1 9 - 2 7 0 4

Phone Number (area code and number)

B. Land Type

C. Owner Type

D. Change of Owner Indicator

(Date Changed)  
Month Day Year

- - - - - P P Yes No - - - - -

ID - For Official Use Only

## VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

## A. Hazardous Waste Activity

## 1. Generator (See instructions)

- ☒ a. Greater than 1000kg/mo (2,200 lbs.)  
☐ b. 100 to 1000 kg/mo (220 - 2,200 lbs.)  
☐ c. Less than 100 kg/mo (220 lbs.)

## 2. Transporter (Indicate Mode in boxes 1-5 below)

- ☐ a. For own waste only  
☐ b. For commercial purposes

## Mode of Transportation

- ☐ 1. Air  
☐ 2. Rail  
☐ 3. Highway  
☐ 4. Water  
☐ 5. Other - specify

- ☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.

## 4. Hazardous Waste Fuel

- ☐ a. Generator Marketing to Burner  
☐ b. Other Marketer  
☐ c. Boiler and/or Industrial Furnace

- ☐ 1. Smelter Deterioral  
☐ 2. Small Quantity Exemption

## Indicate Type of Combustion Device(s)

- ☐ 1. Utility Boiler  
☐ 2. Industrial Boiler  
☐ 3. Industrial Furnace

- ☐ 5. Underground Injection Control

## B. Used Oil Fuel Activities

## 1. Off-Specification Used Oil Fuel

- ☐ a. Generator Marketing to Burner  
☐ b. Other Marketer  
☐ c. Burner - Indicate device(s) - Type of Combustion Device  
☐ 1. Utility Boiler  
☐ 2. Industrial Boiler  
☐ 3. Industrial Furnace

- ☐ 2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

## IX. Description of Regulated Wastes (Use additional sheets if necessary)

## A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☒ 2. Corrosive (D002) ☒ 3. Reactive (D003) ☐ 4. Toxicity Characteristic (D000) ☒

(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))

D 0 0 6 D 0 0 7 D 0 0 8 D 0 0 9

## B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1 F 0 0 1	2 F 0 0 2	3 F 0 0 3	4 F 0 0 5	5 U 0 2 8	6 U 0 3 1
7 U 0 6 9	8 U 1 4 7	9 U 1 9 0	10	11	12

## C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number. See instructions.)

1 P A 0 1	2 D 0 1 9	3	4	5	6
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## X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Name and Official Title (type or print)

STANLEY J. KERKENTZES/PLANT MANAGER

Date Signed

7-23-94

## XI. Comments

BART/dck 9/9/94

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

## SUPPLEMENT TO U.S. EPA NOTIFICATION OF HAZARDOUS WASTE ACTIVITY FORM (EPA Form 8700-12)

I. Installation's EPA I.D. Number

P A D 0 0 0 8 2 4 7 3 0

II. Name of Installation ARISTECH CHEMICAL CORPORATION

III. Location of Installation

PITTSBURGH, PA 15225

Municipality (Township, Borough, City)

ALLEGHENY

County

IV. IRS Employer Identification Number

2 5 - 1 5 3 4 4 9 8

V. SIC Codes (four-digit number in order of priority)

2 8 6 9

Specify: PLASTICIZERS + MALEIC ANHYDRIDE

2 8 2 1

Specify: POLYESTER RESINS

N A

Specify: \_\_\_\_\_

N A

Specify: \_\_\_\_\_

VI. Type of Hazardous Waste Activity

- ☐ 1. Treater  
☐ 2. Storer  
☐ 3. Disposer  
☐ 4. Reuse, Recycle, Reclaim  
☐ 5. Permit by Rule

VII. Existing Environmental Permits

A. NPDES (Discharges to Surface Water)

P A 0 0 0 3 8 3 2

B. UIC (Underground injection of fluids)

C. RCRA (Hazardous Waste)

D. PSD (Air Emissions from Proposed Sources)

E. Municipal Waste (As defined in Act 97)

F. Residual Waste (As defined in Act 97)

G. Permit by Rule

Name of POTW \_\_\_\_\_

POTW NPDES Number

H. Other

(Specify) \_\_\_\_\_



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

400 Waterfront Drive  
Pittsburgh, PA 15222-4745  
February 8, 1994

(412) 442-4000

Southwest Regional Office

NOTICE OF VIOLATION

CERTIFIED MAIL #P 280 445 387

Steve Stockton  
Aristech Chemical Corp  
Neville Island Plant  
200 Neville Road  
Neville Island, PA 15225-1696

RE: Non-Compliance Hazardous Waste  
Activity  
Aristech Chemical Corp  
PAD000824730  
Neville Township  
Allegheny County

Dear Mr. Stockton:

As a result of an inspection conducted by the Department on 1/25/94 at Aristech Chemical Corp, ("Aristech"), located at 200 Neville Road, Neville Township, Allegheny County, it has been determined that Aristech is in violation of the Solid Waste Management Act of the Commonwealth of Pennsylvania ("SWMA"), Act of July 7, 1980, P.L. 380, as amended, P.S. §6018.101 et seq., and the Rules and Regulations promulgated thereunder as follows:

- A. Aristech failed to obtain a permit prior to treating a hazardous waste. Specifically, acidic wastewater (ph <2) from the maleic anhydride process was being neutralized in the two residue tanks. This constitutes a violation of the Solid Waste Management Act, Section 401(a) and Section 270.1(a) of the Department's hazardous waste regulations.
- C. The activities and conditions described in Paragraph A above, constitute unlawful conduct pursuant to Sections 610(2)(4) and (9) of the SWMA; constitute a public nuisance pursuant to Section 601 of the SWMA; and subject the offender to civil penalty liability pursuant to Section 605 of the SWMA.

February 8, 1994

In order to achieve compliance with the SWMA, the implementation of the following is recommended:

1. Immediately cease treating hazardous waste in the maleic residue tanks.
2. Make the necessary modifications to the process lines to eliminate said treatment OR begin shipping and disposing of the wastewater as hazardous waste.
3. If Aristech chooses to manage the wastewater as hazardous waste, tanks should comply with Chapter 265, Subchapter J requirements.
4. By February 28, 1994, submit to the Department a written report addressing the circumstances under which these violations occurred, and the provisions you have taken to prevent their recurrence.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

Also, this letter shall not be construed as a final action of the Department of Environmental Resources

If you have any questions concerning this matter, please contact this office.

Sincerely,



Shawn Staley  
Solid Waste Specialist  
Waste Management

cc: EPA

bc: Regional  
Chron  
Central  
K. Watson  
S. Staley ✓

SS:njh

ARISTECH **RECEIVED**

February 18, 1994

FEB 22 1994

Commonwealth of Pennsylvania  
Department of Environmental Resources  
400 Waterfront Drive  
Pittsburgh, PA 15222-4745  
Attn: Mr. Shawn Staley

DER, Southwest Region  
Bureau of Waste Management

RE: Aristech Chemical Corp  
PAD000823730  
Neville Township  
Allegheny County

Dear Mr. Staley:

This is in response to your Notice of Violation dated February 8, 1994. Aristech Chemical Corporation denies that its Neville Island Plant has engaged in the treatment of hazardous waste in violation of the Solid Waste Management Act as indicated in the Notice of Violation. This process is long standing and was reviewed by the Department in 1986. The process has not changed since that time. As you can see from the attached inspection report from the Department, we asked if we needed a permit for such an addition. The Department's evaluation concluded that "No treatment permit for this process is required under the present regulations."

Nevertheless, in response to the issues you raised during the inspection on January 25, 1994 regarding the addition of the caustic, and to avoid further controversy, we immediately ceased the addition of caustic at the point noted during your inspection. We have modified our process to safely add the caustic to the residue in the line prior to the residue tanks to continue to prevent solids from precipitating out of solution. It is essential to our process that the pH be adjusted in the process to prevent such precipitation of solids which would plug the lines and pumps. This modification will enhance our ability to keep the system from plugging. The residue tanks will contain residual waste and will be managed accordingly.

If you have any questions concerning our response to your inspection report, please contact me at (412) 778-3354.

Sincerely,



Steven D. Stockton  
Manager-Environmental & Safety



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

BUREAU OF WASTE MANAGEMENT  
Highland Building  
121 South Highland Avenue  
Pittsburgh, Pennsylvania 15206-3988  
(412) 665-2900 (answers 24 hrs.)  
645-7100  
April 2, 1986

U.S. Steel Corporation  
Chemical Division  
Neville Island Plant  
Pittsburgh, PA 15225

Attention: Mr. Ted Fusco  
Plant Engineer

RE: Waste/Process Clarification  
U.S.S. Chemical Division  
Neville Township  
Allegheny County  
PAD #000824730

Dear Mr. Fusco:

Enclosed are two (2) copies of the inspection report from March 24, 1986 as discussed. Please sign these and return one copy to this office. The other copy is for your records.

Also enclosed is a current issue of the Rules and Regulations per your request.

If you have any questions, please call this office at 665-2900.

Sincerely,

Kathryn L. Watson  
Solid Waste Specialist  
Bureau of Waste Management

KLW/kld

Enclosure: Inspection Reports  
Regulations -

cc: Allegheny County File  
Chron  
K. Watson (2)



# USS Chemicals

Division of United States Steel Corporation

PITTSBURGH, PENNSYLVANIA 15226  
412/778-3300

NEVILLE ISLAND PLANT

April 4, 1986

Ms. Kathryn L. Watson  
Commonwealth Of Pennsylvania  
Department of Environmental Resources  
Bureau of Waste Management  
Highland Building  
121 South Highland Avenue  
Pittsburgh, Pennsylvania 15206-3988

RE: Waste/Process Clarification  
PAD #000824730

Dear Ms. Watson:

As requested enclosed is the signed inspection report from your March 24, 1986 visit.

Thank you for your quick response to our inquiry concerning the permitting requirements for neutralization of the acidic wastewater generated in the production of maleic anhydride. We will now proceed with the installation of the necessary equipment for the in-tank addition of caustic soda as we discussed during your visit and site inspection.

Sincerely,

Theodore M. Fusco  
Supervisor -  
Environmental Engineering

cdt

Enclosure

bcc: D. F. Vanfossen  
G. R. Hanington  
A. A. Spinola (Monroeville)  
File G10L-3

1 hr travel

HAZARDOUS WASTE INSPECTION REPORT  
Generators - Part A

Date of inspection 3/24/86 Time start 9:00 Time finish 10:30  
Name of inspector Kathy Watson  
Company, installation name US Steel, Chemical Division  
Location Newville Island, Pittsburgh, PA 15225  
County Allegheny Municipality Newville Island  
Identification number PADE000824730  
Name of responsible official Ted Fusco  
Title Plant engineer  
Mailing address same  
Area code and phone no. (412) 778-3354  
Name of person interviewed Ted Fusco  
Title same  
Mailing address (if different from above) same  
Area code and phone no. same

1. Current waste handling method:

- a. ☐ On-site ☐ treatment ☐ storage, ☐ disposal  
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim  
c. ☐ Off-site ☐ treatment, ☐ storage, ☐ disposal  
d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. \_\_\_\_\_ kg./mo.  
b. \_\_\_\_\_ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☐ No

HAZARDOUS WASTE INSPECTION REPORT  
Part C - Comments

Date of Inspection March 24, 1986 Identification Number PA0000024730  
 Company, Installation Name US Steel Chemical Division  
 County Allegheny Municipality Neville Island

- The facility has a process line from which waste maleic acid is produced. The facility has been checking into the possibility of adding caustic into the process to raise the pH of the acid to approximately pH 4. The sole purpose of the pH adjustment would be to prevent the solids from precipitating out of solution, as the solids clog the lines. Once precipitates build up, the process must be shut down to clean the lines. The facility questioned the Department as to whether a treatment permit or permit-by-rule would be needed for the addition of caustic.

Although the pH adjustment to the maleic acid renders it non-hazardous, the Department has determined after reviewing the process that the addition of caustic to the system can be considered a part of the process and is not hazardous waste treatment. No treatment permit for this process is required under the present regulations.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) \_\_\_\_\_

Date \_\_\_\_\_



**COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES**

BUREAU OF WASTE MANAGEMENT  
Highland Building  
121 South Highland Avenue  
Pittsburgh, Pennsylvania 15206-3988  
(412) 645-7100 (answers 24 hrs.)

April 23, 1991

NOTICE OF VIOLATION

CERTIFIED MAIL #P-832 665 790

Mr. Stanley Kerkentzes  
Plant Manager  
Aristech Chemical Corporation  
Neville Island Plant  
200 Neville Road  
Neville Island, PA 15225

RE: April 16, 1991 Inspection  
Aristech Chemical Corporation  
Neville Island Plant  
Neville Township  
Allegheny County  
PAD000824730

Dear Mr. Kerkentzes

This Notice of Violation is to confirm the findings of the Department's referenced inspection of your hazardous waste generator activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.450 of the Rules and Regulations of the Department and the Pennsylvania Solid Waste Management Act (35 P.S. §6018). Violations of applicable sections of these regulations and the Act found during the inspection are as follows:

1. Eighteen hazardous waste manifests were noted either missing or with incorrect Pennsylvania hazardous waste transporter license numbers, in violation of 25 Pa. Code §75.262.20(g)(5).
2. Four hazardous waste manifests were noted either missing or with duplicate manifest document numbers, in violation of 25 Pa. Code §75.262.20(g)(1).

3. The hazardous waste n-butyl alcohol solution storage tank is not routinely inspected, in violation of 25 Pa. Code §75.262.34(a)(2) and 75.265.195.
4. The hazardous waste n-butyl alcohol solution tank is not properly labeled for storage of hazardous waste in violation of 35 P.S. §6018.403(b)(2).
5. Thirty-five drums of hazardous waste were noted on-site without proper labeling, in violation of 25 Pa. Code §75.262.34(a)(2) and 35 P.S. §6018.403(b)(2).
6. Twenty-three drums of hazardous waste were noted on-site in storage without benefit of marked accumulation dates, in violation of 25 Pa. Code §75.262.34(a)(4).
7. Twenty-three drums of hazardous waste were noted in storage which were marked inadequately as hazardous waste, in violation of 25 Pa. Code §75.262.34(a)(2).
8. Twenty-one drums of hazardous waste were noted either open or improperly/incompletely closed, in violation of 25 Pa. Code §75.262.34(a)(3) and §75.265.173(a).
9. At least nine hazardous waste storage locations were noted on-site which were not properly diked to contain hazardous waste spills and prevent run-on, in violation of 25 PA Code §75.262.34(a)(3) and §75.265.178.
10. One hazardous waste storage area was noted not to be constructed on an impervious base, in violation of 25 Pa. Code §75.262.34(a)(3) and 75.265.178.
11. One hazardous waste manifest was noted on file at this facility without a returned copy or a filed exception report, in violation of 25 Pa. Code §75.262.42.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Towards this end, please submit to the Department by May 30, 1991 a proposed abatement program and schedule for correcting these violations. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

Aristech Chemical  
Corporation

- 3 -

April 23, 1991

This Notice of Violation does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this Notice of Violation or the conditions upon which the Notice of Violation is based. This Notice of Violation shall not be construed so as to waive or impair any rights of the Department of Environmental Resources heretofore or hereafter existing.

This Notice of Violation shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this Notice of Violation, please feel free to contact me at my office.

Sincerely,

David K. Waldorf  
Solid Waste Specialist  
Bureau of Waste Management  
Southwestern Region

DKW:jc

cc: Central - Division of Compliance and Monitoring  
EPA  
Regional File  
Chron File

1. EPA ID: PA0000824730

2. MANAGER NAME: Aristech - Neville Isl

3. ADDRESS: Neville Isl. PA

4. Data Entry

New ☒  
Update ☐

5. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 4/16/91

5a. AGENCY RESPONSIBLE FOR EVALUATION: Put code in box

E = EPA  
S = State  
C = Contractor/EPA  
O = Other  
B = Contractor/State  
X = Oversight

6. TYPE OF EVALUATION COVERED BY THIS REPORT:

Select Evaluation Type and insert in box: 1

1 = Compliance Eval. Inspection (CEI) 4 = Comp GUM Eval (CME)  
2 = Sampling Inspection 5 = Compliance Sched. Eval  
3 = Record Review 11 = Case Dev. Inspection  
12 = O&M Inspection  
13 = CA Oversight Insp.

7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5):   /  /  

7a. Eval. Comments: RC Rule

8. CLASS and VIOLATIONS

Key.	Class of	Violations							
	Violation	GUM	C/PC	Fin. Res.	Pt. B	Compl. Sch	Manifest	Land-Ban	Other
'X' = Violations, no Specialties							0	0	0
'B' = Violations & Specialty	I								
'S' = Same Viol./Specialty							X	0	X
'Z' = Pending determination	II								
'J' = No Viol or Specialty found									
Acceptable Codes									
		X	X	X	X	X	X	X	X
		S	S	S	S	S	S	S	S
		Z	Z	Z	Z	Z	Z	Z	Z
		O	O	O	O	O	O	O	O
		H	H	I*	H	C	H	H	H
				B*		B			
				H		H			

Specialties

'I' = No Insurance only  
'C' = CA Schedule Violation  
'H' = NPV  
'\*' = Class I only

8a. Viol. Comment:   

9. ENFORCEMENT ACTIONS:

Area of	Type	Date Action	Compliance Dates		Penalty		Resp. Ag.
Class	Violations (use code)	Taken	Scheduled	Actual	Assessed	Collected	(use code)
02	MA 01	03	4/23/91				

Codes for  
Types of  
Enforcement  
Actions:

03 = Warning Letter  
04 = Admin. Complaint  
05 = Final Admin. Order  
10 = Informal

11 = Filed Civil Action  
12 = Filed Criminal Action  
18 = Civil Referral to AG/DOJ  
19 = Final Judicial Order

15 = CA Init. Admin Order  
16 = CA Final Admin Order  
21 = Notice of Non-comp.  
22 = FFCA  
23 = Fed. Fac. Referral to HQ

Resp Agcy Codes  
E = EPA  
S = State  
X = EPA Oversight

10. Enforc. Comment:   

262.20(g)(1)  
" (g)(5)  
34(a)(2)  
34(a)(4)  
34(a)(3)  
47.

205.195  
" 173 (K)  
178

IR NOV

Hazardous Waste Inspection Report  
Comments - Part C

Page 3 of 4

Date of Inspection 4/16/91 Identification Number PA10000824730  
Company, Installation Name Aristech - Neville Island  
County Allegheny Municipality Neville Twp.

- ⑩ One hazardous waste manifest (MA(1196263)) was noted on file without a return copy or a filed exception report on file, in violation of 25 PA Code 75.262.42. This manifest was dated 4/9/90.
- ⑪ All drums of hazardous waste referred to in this report are 55 gallon drums.
- ⑫ One waste stream on site, "strip/strip alcohol" was noted to be burned on site as fuel in an industrial furnace. Flash point analysis records from October 1988 indicate that this material flashes at 148°F, barely over the POOL threshold. This facility should periodically retest this material to ensure that RBA status is not appropriate for this furnace (unless this facility notifies as such).
- ⑬ During this inspection 22 drums of contaminated water were noted of unknown origin. A hazardous waste determination should be performed on these ASAP.
- ⑭ Two old drums of sodium bichromate were noted on site which were formerly used in plant water pre-treatment. If disposed, these drums will be hazardous wastes (0007).  
- No T.C. violations noted -

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) [Signature] Date 4/16/91  
Inspector (signature) [Signature] Date 4/16/91

EPA

Hazardous Waste Inspection Report  
Comments - Part C

Page 4 of 4

Date of Inspection 4/16/91 Identification Number PAD000824730  
Company, Installation Name Aristech - Neville Island  
County Allegheny Municipality Neville Twp.

## LAND DISPOSAL RESTRICTIONS COMMENTS

① No violations noted.

*This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.*

Person Interviewed (signature) Thomas E. Thibault Date 4/16/91  
Inspector (signature) [Signature] Date 4/16/91

Hazardous Waste Inspection Report  
Generators - Part A

Date of inspection 4/16/91 Time start 8:10 AM Time finish 4:30 PM  
 Name of inspector David Winkler  
 Company, installation name Aristech Chemical Corp - Neville Isl Plant  
 Location 200 Neville Rd  
 County Allegheny Municipality Neville Twp  
 Identification number PA 000824730  
 Name of responsible official Stanley Kerkentees  
 Title Plant Mgr.  
 Mailing address 200 Neville Rd., Neville Island PA 15225  
 Area code and telephone number (412) 788-3354  
 Name of person interviewed Steve Stockton / Gene Turocz  
 Title Envtl. & Safety Mgr. / Envtl. & Industrial Hygiene Tech.  
 Mailing address (if different from above) - same -  
 Area code and telephone number - same -

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR  
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim  
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal  
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 30597 kg./mo. (4th Qtr. 1990)  
 b. \_\_\_\_\_ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
5026/069/147/190	ENSCO Inc	El Dorado, AR Inc
"	Chemical Waste Mgmt.	Emelle, AL CDFI
0301/F003	Chemtron Corp	Aron, OH
0001	Chem Waste Mgmt Resource Recy	W. Carrollton, OH BRS
0001	Oldover Corp	Arsonia, VA
0001	Ross Incineration	Greetham, OH
0018, 0001/2/6, F001/3	Clean Harbors of Braintree	Braintree, MA

EPA

Hazardous Waste Inspection Report  
Generators - Part BAristech - North Is  
PAD000 924730  
4/16/91

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.262
1				Hazardous waste determination, copies available	T.C. Rule	(b)
1				Identification number		(c)(1)
1				Hazardous waste shipments offered only to licensed transporters		(c)(4)
1				Authorization received from TSD facility for wastes shipped off-site		(d)
1				PA manifest used for intrastate shipments		(e)(2)
1				Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
			(4)	Manifests filled out properly and completely		(e)(7)
1				Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
		3		Proper U.S. DOT shipping containers or packages		(f)(1)(i)
		3		Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
		3		Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
		3		Placards offered to transporter		(f)(2)
1				Wastes accumulated on-site for less than 90 days		(g)(1)(i)
			(4)	Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
			(4)	Containers managed in accordance with 75.265(q)(1)–(9)		(g)(1)(iii)
			(4)	Containers clearly marked with accumulation date and visible for inspection		(g)(1)(iv)
1				Records retained at designated location for 20 years		(h)
1				Quarterly reports submitted to the Department		(i)
			(4)	Exception reporting procedures followed		(j)
	2			Hazardous waste disposal plan, if required		(l)
1				Spill reporting procedures followed		(m)(1)
1				Preparedness, Prevention and Contingency Plan and <u>implemented</u>		(m)(5)
	2			Special requirements followed for international shipments		(o)
1				On the job or classroom personnel training program (75.265(f))		(g)(1)(6)
1				Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)

Hazardous Waste Inspection Report  
Comments - Part C

Page 1 of 4

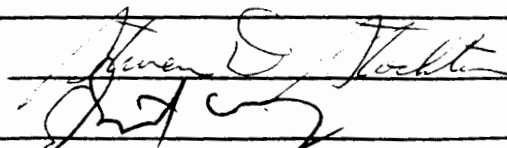
Date of Inspection 4/16/91 Identification Number PAN 000824730  
Company, Installation Name Aristech Chemical - Neill's Isl.  
County Allegheny Municipality Neill's Twp.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

- PA
- ① Eight hazardous waste manifests were noted without a transporter license number, and ten hazardous waste manifests were noted with incorrect PA transporter license numbers, in violation of 25 PA Code 75.262.20(g)(5).
  - ② Two hazardous waste manifests were noted missing unique five digit manifest document numbers, and two manifests were noted using identical such numbers, in violation of 25 PA Code 75.262.20(g)(1).
  - ③ D001 hazardous waste n-butyl alcohol solution (not used as solvent) was noted to be stored in an above ground tank which is not managed in conformance with Subpart J of Chapter 265 (Section 265.195 - Inspections), in violation of 25 PA Code 75.262.34(a)(2).
  - ④ The D001 hazardous waste storage tank noted in ③ above is likewise not properly labeled for the storage of hazardous waste, in violation of Act 97, Section 403(b)(2).

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

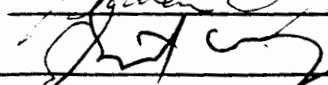
Person interviewed (signature)



Date

4/16/91

Inspector (signature)



Date

4/10/91

EPA

Hazardous Waste Inspection Report  
Comments - Part C

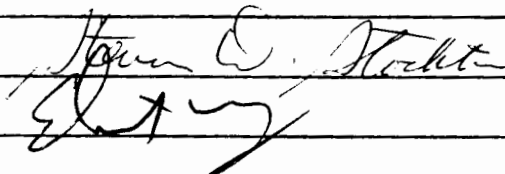
Page 2 of 4

Date of Inspection 4/16/91 Identification Number PA0000827730  
Company, Installation Name Aristech - Newlle Island  
County Allegany Municipality Newlle Twp.

- (5) Twenty three drums of hazardous waste in storage, and twelve drums of hazardous waste in accumulation, were noted on site ~~without~~ without labeling as hazardous waste in violation of 25 PA Code 75.262.34(a)(2) and Section 403(b)(2) of Act 57.
- (6) Twenty three drums of hazardous waste (same as above) were noted in storage w/o benefit of marked accumulation dates, in violation of 25 PA Code 75.262.34(a)(4).
- (7) Also, at the thirty drums of hazardous waste stored at the material handling building, the twenty-three drums which were marked as hazardous waste were not marked with appropriate waste codes, in violation of 25 PA Code 75.262.34(a)(2).
- (8) Twelve drums of hazardous waste in storage, and nine drums of hazardous waste in accumulation were noted open and/or improperly and/or incompletely closed, in violation of 25 PA Code 75.262.34(a)(3) and 269.173(a).
- (9) At least 9 locations were noted where hazardous waste was being stored without appropriate diking to contain spills, in violation of 25 PA Code 75.262.(a)(3) and 269.178. One of these areas was noted not to have an impervious base, as well a violation as cited.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

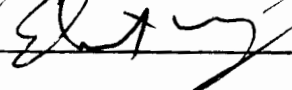
Person Interviewed (signature)



Date

4/16/91

Inspector (signature)



Date

4/16/91



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
BUREAU OF WASTE MANAGEMENT  
Highland Building  
121 South Highland Avenue  
Pittsburgh, Pennsylvania 15206-3988  
(412) 645-7100 (answers 24 hrs.)

November 21, 1989

NOTICE OF VIOLATION

CERTIFIED MAIL #P 979 043 337

Stanley Kerkentzes, Plant Manager  
Aristech Chemical Corporation  
Neville Island Plant  
200 Neville Road  
Neville Island, Pennsylvania 15225

RE: November 8, 1989 Inspection  
Aristech Chemical Corporation  
Neville Island Plant  
Neville Township  
Allegheny County  
PAD00824730

Dear Mr. Kerkentzes:

This Notice of Violation is to confirm the findings of the Department's referenced inspection of your hazardous waste generator activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.450 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during the inspection are as follows:

1. The hazardous waste rolloff box storage area is not on an impermeable diked base, in violation of 25 Pa. Code Section 75.262(g)(1)(iii) and 75.265(q)(10 and 11).

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Towards this end, you are to submit to the Department by December 15, 1989 a proposed abatement program and schedule for correcting these violations. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This Notice of Violation does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this Notice of Violation or the conditions upon which the Notice of Violation is based. This Notice of Violation shall not be construed so as to waive or impair any rights of the Department of Environmental Resources heretofore or hereafter existing.

November 21, 1989

This Notice of Violation shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this Notice of Violation, please feel free to contact me at my office.

Sincerely,

David Waldorf  
Bureau of Waste Management  
Southwestern Region

DW:jmt

cc: Central - Division of Compliance and Monitoring  
EPA  
Regional File  
Chron File

Hazardous Waste Inspection Report  
Generators - Part A

GEN

Date of inspection 11/8/89 Time start 8:00 AM Time finish 12:30 PM  
 Name of inspector David Waldorf  
 Company, installation name Aristech Chemical Corp. - Neville Is. Plant  
 Location 200 Neville Rd  
 County Allegheny Municipality Neville Twp  
 Identification number PAD000824730  
 Name of responsible official Stanley Ken Kentzes  
 Title Plant Manager  
 Mailing address Neville Island, PA 15225  
 Area code and telephone number (412) 788-3354  
 Name of person interviewed John Koch / Steve Stockton  
 Title Envtl. + Industrial Hygiene Tech. / Envtl. and Safety Mgr.  
 Mailing address (if different from above) - same -  
 Area code and telephone number - same -

## 1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR  
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim  
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal  
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

## 2. Amount of hazardous waste produced:

- a. 4640 kg./mo. (3rd qtr, 1989)  
 b. \_\_\_\_\_ kg./yr.

## 3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
U029/U069/U147/U190	ENSCO Inc	El Dorado, AR Incr.
" " " "	Chemical Waste Management	Emelle, AL LDI
D001	CWM Resource Recovery	W. Carrollton, OH fuels blend
F003 F001	Chemtron Corp	Avon OH RRR " "
F001	Fontana Chemical Waste Sols.	Niagara Falls, NY " "
D002	Chem-Clear	Cleveland, OH TRI
D002	GSX Chemical Sols of Ohio	" " " "

EPA

Hazardous Waste Inspection Report  
Generators - Part BAristech - Norville, Pa.  
PA D000824730  
11/8/89

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.262
/				Hazardous waste determination, copies available		(b)
/				Identification number		(c)(1)
/				Hazardous waste shipments offered only to licensed transporters		(c)(4)
/				Authorization received from TSD facility for wastes shipped off-site		(d)
/				PA manifest used for intrastate shipments		(e)(2)
/				Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
/				Manifests filled out properly and completely		(e)(7)
/				Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
		3		Proper U.S. DOT shipping containers or packages		(f)(1)(i)
		3		Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
		3		Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
		3		Placards offered to transporter		(f)(2)
/				Wastes accumulated on-site for less than 90 days		(g)(1)(i)
/				Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
			(4)	Containers managed in accordance with 75.265(q)(1)-(4)		(g)(1)(iii)
/				Containers clearly marked with accumulation date and visible for inspection		(g)(1)(iv)
/				Records retained at designated location for 20 years		(h)
/				Quarterly reports submitted to the Department		(i)
/				Exception reporting procedures followed		(j)
	2			Hazardous waste disposal plan, if required		(l)
/				Spill reporting procedures followed		(m)(1)
/				Preparedness, Prevention and Contingency Plan and implemented		(m)(5)
	2			Special requirements followed for international shipments		(o)
/				On the job or classroom personnel training program (75.265(f))		(g)(1)(6)
			(4)	Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)

Hazardous Waste Inspection Report  
Comments - Part C

Date of Inspection 11/8/89 Identification Number PAD000824730  
Company, Installation Name Aristech Chemical Corp. - Neville Island Plant  
County Allegheny Municipality Neville Twp

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

- ① The hazardous waste roll-off box storage area is not on an impermeable, diked base, in violation of 25 PA Code 75.262(g)(1)(iii) and 75.265(g)(10+11). Containment meeting these requirements is present for 55 gal drum storage of liquid hazardous waste, however.
- ② Weekly inspection records for the drum waste storage pad were missing for the third quarter, 1989, at the time of this inspection, in violation of 25 PA Code 75.262(g)(1)(iii) and 75.265(g)(5). Mr. Koch advises that he will locate the missing log sheet and forward it to the office.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) J. P. [Signature]Date 11/8/89Inspector (signature) [Signature]Date 11/8/89

FPA

Hazardous Waste Inspection Report  
Comments - Part C

Date of Inspection 11/8/89 Identification Number PAD 000 824730  
Company, Installation Name Aristech Chemical Corp. - Verille Island Plant  
County Allegheny Municipality Verille Twp.

## LAND DISPOSAL RESTRICTIONS COMMENTS

- ① All wastes from this facility are banned from land disposal\*, the only soft-hammer waste generated at this facility is U147.
- ② All waste streams within the plant appear to be disposed accompanied by appropriate LDR Notifications / Certifications. All hard-hammer wastes are shipped certified as not meeting LDR treatment standards, with the exception of U029 / U069 / U190 contaminated soil and debris which is shipped to Enelle AL. The notification form for this material indicates that this waste is subject to a variance which expires 6/8/91.

\*either as California List, First-Third, or as liquids.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) J. P. K. K. Date 11/8/89  
Inspector (signature) [Signature] Date 11/8/89

GEN

Hazardous Waste Inspection Report  
Generators - Part A

Date of inspection 8/11/88 Time start 10:00 Am Time finish 3:00 pm  
 Name of inspector T. Goodwald  
 Company, installation name Aristech Chemical Corp  
 Location Neville Island, Pittsburgh, PA 15225  
 County Allegheny Municipality Neville Island  
 Identification number PAD 000824730  
 Name of responsible official Jim Bischoff  
 Title MGR of Production  
 Mailing address same  
 Area code and telephone number 412/778-3354  
 Name of person interviewed John Koch / Mike Klobuka  
 Title Environmental & Industrial Hygiene Tech / Supt. of Maint.  
 Mailing address (if different from above) same  
 Area code and telephone number same

## 1. Current waste handling method:

- |    |  |                                     |                                   |  |                                  |
|----|--|-------------------------------------|-----------------------------------|--|----------------------------------|
| a. | <input type="checkbox"/> On-site             | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal            | <input type="checkbox"/> PBR     |
| b. | <input type="checkbox"/> On-site             | <input type="checkbox"/> use,       | <input type="checkbox"/> reuse,   | <input type="checkbox"/> recycle,            | <input type="checkbox"/> reclaim |
| c. | <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal |                                  |
| d. | <input type="checkbox"/> Off-site            | <input type="checkbox"/> use,       | <input type="checkbox"/> reuse,   | <input type="checkbox"/> recycle,            | <input type="checkbox"/> reclaim |

## 2. Amount of hazardous waste produced:

- a. \_\_\_\_\_ kg/mo.  
 b. ~16 million lbs/yr kg/yr.

## 3. Types of hazardous waste produced by Hazardous Waste Number:

0002 F003 F001 U147 U069 D004 U134 P048  
 D001 D009 F005 U028 U190 D007 P012

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

RCRA COMPLIANCE SECTION  
 RECEIVED  
 AUG 31 1988

## Hazardous Waste Inspection Report Generators – Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.262
X				Hazardous waste determination, copies available		(b)
X				Identification number		(c)(1)
X				Hazardous waste shipments offered only to licensed transporters		(c)(4)
X				Authorization received from TSD facility for wastes shipped off-site		(d)
X				PA manifest used for intrastate shipments		(e)(2)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
X				Manifests filled out properly and completely		(e)(7)
X				Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
X				Proper U.S. DOT shipping containers or packages		(f)(1)(i)
X				Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
X				Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
X				Placards offered to transporter		(f)(2)
X				Wastes accumulated on-site for less than 90 days		(g)(1)(i)
			(X)	Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
			(X)	Containers managed in accordance with 75.265(q)(1)–(9)		(g)(1)(iii)
			(X)	Containers clearly marked with accumulation date and visible for inspection		(g)(1)(iv)
X				Records retained at designated location for 20 years		(h)
X				Quarterly reports submitted to the Department		(i)
	X			Exception reporting procedures followed		(j)
X				Hazardous waste disposal plan, if required		(l)
X				Spill reporting procedures followed		(m)(1)
X				Preparedness, Prevention and Contingency Plan and implemented		(m)(5)
	X			Special requirements followed for international shipments		(o)
X				On the job or classroom personnel training program [75.265(f)]		(g)(1)(6)
X				Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)

## Inspection Report Comments

Date of Inspection 8/11/88 Identification Number PAD000824730  
Company/Facility/Site Name Aristech Chemical Corp.

Violations:

Sec 75.265(g)(1) - 1 drum containing hazardous waste, labeled F003 was severely bulged at both ends and setting one row high on a pallet. This drum should be overpacked or the contents transferred to an undamaged drum.

Sec 75.265(g)(iv), Act 97 Sec 403(2) - Roll-off Box containing hazardous waste was not labeled as to accumulation date or type of waste contained. This container should be labeled with proper information.

Notes:

- Four drums of non-hazardous waste polyester resin, waiting to be placed in a roll-off Box did not have secure lids. This material was setting close to a storm drain and could possibly enter the drain in the event of a spill.
- Four badly rusted drums located on the side of the old firehouse should be overpacked or the material inside should be transferred to intact drums.
- Update of PPC Plan should be sent to my attention. John Koch claimed he will send a copy to the Dept.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were observed during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification may be forthcoming, confirming any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) mailed

Date

Inspector (signature)

Terry E. Goodwald

Date

8/11/88

Page 3 of 3



Aristech Chemical Corporation  
600 Grant Street  
Pittsburgh, PA 15230-0250  
412/433-2973

**Jerome J. Pottmeyer, III**  
Counsel

March 28, 1988

**RECEIVED**

APR 1 1988

EPA, REGION III  
OFFICE OF REGIONAL ADMINISTRATOR

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. John Haluszczyk  
Pennsylvania Department  
of Environmental Resources  
Bureau of Waste Management  
Highland Building  
121 South Highland Ave.  
Pittsburgh, PA 15206-3988

RE: Financial Assurance  
Aristech Chemical Corporation  
Neville Island Plant

Dear Mr. Haluszczyk:

Enclosed please find the following documents submitted by Aristech Chemical Corporation (Aristech) to demonstrate compliance with the financial assurance requirements at its Neville Island, Pennsylvania plant:

- 1) Letter from Aristech's Chief Financial Officer (including statement required by Title 25, Pennsylvania Code §75.342(b));
- 2) A copy of the independent certified public accountant's report on examination of Aristech's financial statements for the latest completed fiscal year (as contained in Aristech's 1987 Annual Report);
- 3) A special report from Aristech's independent certified public accountant; and



Mr. John Haluszczak

Page 2


March 28, 1988

- 4) A set of procedures that Aristech will make available to the public to process claims filed for personal injury and property damage to third parties.

A Collateral Bond for Hazardous Waste Facility, Collateral Bond Endorsement (Pre-Existing Liability), Irrevocable Standby Letter of Credit, and Amendment to the Irrevocable Standby Letter of Credit are already on file with the Department of Environmental Resources. The Amendment to the Irrevocable Standby Letter of Credit extended the date of expiration to March 27, 1989. However, no adjustment for inflation is being made to the estimated closure costs of \$32,935 at this time as a result of the process changes made at Neville Island eliminating the need for a hazardous waste permit and pending your request to Harrisburg regarding release of the collateral bond.

If you have any questions, please call me at  
(412) 433-2973.

Very truly yours,



Jerome J. Pottmeyer, III

JJP:kk  
Enclosures

cc: ✓ Regional Administrator - w/encls.  
U.S. Environmental Protection Agency  
Region III  
841 Chestnut Street  
Philadelphia, PA 19107



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

BUREAU OF WASTE MANAGEMENT  
Highland Building  
121 South Highland Avenue  
Pittsburgh, Pennsylvania 15206-3988  
(412) 645-7100 (answers 24 hrs.)

January 4, 1988

Aristech Chemical Corporation  
Neville Island Plant  
Pittsburgh, PA 15225

Attention: Stanley J. Kerkentzes  
Manager - Environmental Safety

USX CHEMICAL-AR

RE: Aristech Chemical Corporation  
Neville Island  
EPA I.D. No. PAD000824730  
Totally Enclosed Treatment

Dear Mr. Kerkentzes:

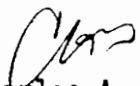
On June 26, 1987, you indicated that the above referenced facility had installed the necessary equipment to conduct hazardous waste treatment in a totally enclosed treatment system as defined in Section 75.260 of the Rules and Regulations of the Department.

On December 16, 1987 the Department conducted an inspection of the facility and determined that the unit, that adjusts the pH of waste waters that were originally hazardous waste by characteristic of corrosivity, does meet the definition of Section 75.260(a). Therefore, the unit and the incinerator downstream from it no longer need to be covered by a hazardous waste permit under the provisions of Section 75.264(a)(3)(vi).

As a result of this determination and your September 24, 1987 request to withdraw your hazardous waste management permit application, we are also returning your Part B application for a hazardous waste incinerator.

If you have any further questions about this matter, please feel free to contact me at this office.

Sincerely,

  
Charles A. Duritsa  
Regional Solid Waste Manager

CAD/JAH:bc

cc: Central  
Regional  
County  
Chron



**USS  
Chemicals**

Division of United States Steel Corporation

PITTSBURGH, PENNSYLVANIA 15230

RECEIVED  
PA SECTION

NOV 10 1986

**EPA, R3**

November 6, 1986

Mr. Charles Duritsa  
Commonwealth of Pennsylvania  
Department of Environmental Resources  
Bureau of Solid Waste Management  
Highland Building  
121 Highland Avenue  
Pittsburgh, Pennsylvania 15206-3988

Re: USX Corporation  
USS Chemicals Division  
Neville Island Plant  
RCRA Permit  
EPA I.D. No. PAD 000824730

Dear Mr. Duritsa:

Enclosed please find USS Chemicals' submission of the Part B Permit Application for its Neville Island Plant. (A certified check for \$3500 is also enclosed for the application fee.) This permit application is to cover the incineration of wastewater generated in the production of polyester resins.

This submission is intended to be a protective filing to assure that the Plant operates in a permitted status. We are making a protective filing because whether a RCRA permit is required for the incineration of wastewater generated in the production of polyester resins is unclear.

Thus, until the Ashland Chemical Company decision by Region IX, it seemed clear that the incineration of gaseous and water wastes from polyester resin production was exempted from permitting as a totally enclosed treatment facility. The availability of that exemption is no longer assured for similar operations, such as ours.

On the basis of current regulations and the actions of our polyester producing competitors with regard to RCRA permitting, we do not believe that a Part B permit is required when gaseous process emissions from polyester resin production are incinerated.

Mr. Charles Duritsa  
November 6, 1986  
Page 2

In any event, USS Chemicals is in the process of studying appropriate modifications to its production facilities at the Neville Island Plant that may eliminate the need for a hazardous waste incinerator. In the event that USS Chemicals decides to modify its facilities, it will notify the Agency and initiate those actions necessary to withdraw the Part B Permit Application when it has completed its studies and testing.

Very truly yours,



Charles W. Hamilton  
Senior Vice President  
Chemicals & Specialty Products

JJP/jrh  
Enclosure

File

RECEIVED  
PA SECTION

JUN 29 1987



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES **EPA, R3**  
BUREAU OF WASTE MANAGEMENT  
Highland Building  
121 South Highland Avenue  
Pittsburgh, Pennsylvania 15206-3988  
(412) 645-7100 (answers 24 hrs.)

June 26, 1987

Aristech Chemical Corporation  
Neville Island Plant  
Pittsburgh, PA 15225

Attention: Ted Fusco, Manager  
Environmental Safety

(FORMERLY USS CHEMICALS)

RE: Aristech Chemical Corporation  
Neville Island Plant  
EPA I.D. #PAD000824730  
Neville Island  
Allegheny County

Dear Mr. Fusco:

I am writing in regards to your April 16, 1987 letter and recent phone calls concerning the status of the permit application for the above referenced facility. Our discussions have centered on the need for a Part B Hazardous Waste Management Permit for the combustion process in view of the recent changes Aristech has implemented in the process. In our February meeting, you indicated that you wished to change the status of your facility from a TSD facility to only a generator by readjusting the processes so that the waste is no longer ignitable, nor corrosive (as a result of your totally enclosed treatment system) when it enters the incinerator.

The next step that Aristech should take would be to notify the Department that the totally enclosed treatment unit is in full operation with all of the necessary backup units. At this time you should submit a Notification of Hazardous Waste activity form which I have enclosed. Be sure that the cover letter you submit to the Department is specific and details how the facility is to go from a TSD facility to a generator only with a totally enclosed treatment unit. At that time you should also request the return of your hazardous waste Part B permit application.

At that time the Department anticipates conducting an inspection of the unit to insure that it complies with our regulations and guidance on totally enclosed treatment units and that the waste going into the incinerator is no longer hazardous.

Once the Department has confirmed that this is the case, Aristech can apply for a bond release under the requirements described in Section 75.325(a) of the Rules and Regulations of the Department and the requirement for insurance at that time would also be eliminated.


Aristech Chemical Corporation

-2-

June 26, 1987


If you have any questions about this matter, please contact me.

Sincerely,



John A. Haluszczak  
Hazardous Waste Coordinator  
Bureau of Waste Management  
Southwest Region

JAH/ld

cc: Central  
County  
Chron  
EPA   
Jerry Pottmeyer



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

BUREAU OF WASTE MANAGEMENT  
Highland Building  
121 South Highland Avenue  
Pittsburgh, Pennsylvania 15206-3988  
(412) 665-2900 (answers 24 hrs.)

September 17, 1986

RECEIVED  
PA SECTION

CERTIFIED MAIL #P 041 011 884

U. S. Steel, Chemical Division  
Neville Island Plant  
Pittsburgh, PA 15225

SEP 19 1986

EPA, R3

Attention: Mr. Ted Fusco  
Supervisor of Environmental Engineering

RE: Incinerator Status  
USS Chemical Division  
Neville Township  
Allegheny County  
PAD000824730

Dear Mr. Fusco:

Pursuant to the recent meeting between USS Chemical Division and the Department, the operating status of the hazardous waste incinerator at your Neville Island facility has been reviewed by the DER Central Office in Harrisburg.

In order to allow the continued operation of the hazardous waste incinerator without current interim status or permit, the Department requests that USS Chemical Division enter into a Consent Order & Agreement until the permit application has been reviewed and a permit granted.

A civil penalty will be assessed for the illegal operation of the hazardous waste incinerator, and will be a part of the Consent Order & Agreement.

If you have any questions, please call this office at 665-2900.

Sincerely,

*K. Watson*

Kathryn L. Watson  
Solid Waste Specialist  
Bureau of Waste Management

KLW/lid

cc: Regional File  
Chron  
Central  
EPA - Carl Spadaro  
Litigation - Ken Bowman  
Charles Duritsa  
Compliance Specialist  
Kathy Watson (2)

*Pat Anderson*



**USS  
Chemicals**

Division of United States Steel Corporation

PITTSBURGH, PENNSYLVANIA 15225  
412/771-6200

August 20, 1986

NEVILLE ISLAND PLANT

USEPA Region III  
Hazardous Waste Management Division  
841 Chestnut Street  
Philadelphia, PA 19107

Gentlemen:

Enclosed is USS Chemicals Neville Island Plant's biennial waste minimization activity report for the 1984-1985 reporting period.

The lateness of this submittal is our oversight. We had assumed that the State of Pennsylvania regulated all the facets of the RCRA programs. Since Pennsylvania specifies quarterly reporting of our hazardous waste activities and does not require a biennial report, we missed the EPA waste minimization notification requirement.

Should you have any question concerning the attached report please contact me or Ted Fusco, Supervisor of Environmental Engineering (412) 778-3354.

Sincerely,

E.R. Fluharty  
Plant Manager

ERF/dlm

cc: PA DER

**RECEIVED**

**AUG 25 1986**

**Waste Management Branch  
EPA - Region III**

NOTIFICATION OF WASTE MINIMIZATION ACTIVITY - 1985

Name of Installation: USS Chemicals  
Installation Address: 200 Neville Road, Pittsburgh, PA 15225  
EPA ID No.: PAD 000 824 730  
Ownership: USX Corporation, 600 Grant Street, Pittsburgh,  
PA 15230  
Installation Contact: Eugene R. Fluharty, Plant Manager

SECTION A: HAZARDOUS WASTE GENERATED:

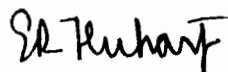
<u>YEAR</u>	<u>VOLUME</u> (POUNDS X 10 <sup>3</sup> )
1983	21,625
1984	14,148 *
1985	13,893

\* Does not include 2,121,000 lbs. of waste generated from a one time clean-out activity in closing the vessels associated with the shutdown of the phthalic anhydride production facility.

SECTION B: SUMMARY OF THE WASTE MINIMIZATION ACTIVITY

Improvements in operating procedures in both the maleic anhydride and polyester resin plants have been instrumental in reducing the waste volume generated. Developmental work undertaken in 1985 has shown that change in the manufacturing process will render our high volume waste stream non-hazardous. With the addition of this processing step, an 80 percent reduction in hazardous waste generation is forecasted for this facility. Limiting the volume of off-grade material generated through tighter process controls will continue to be an operating goal.

Authorized Representative,



E.R. Fluharty  
Plant Manager

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

### Comments

**Continue on reverse**

ID — For Official Use Only													
C												T/A	C
W													1

# X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 1	F 0 0 3				
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U 0 0 2	U 0 2 8	U 0 3 1	U 0 6 9	U 1 4 7	U 1 5 1
37	38	39	40	41	42
U 1 9 7	U 1 6 1	U 1 9 0	U 2 2 6	U 2 3 9	
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☒ 1. Ignitable  
(D001)

☒ 2. Corrosive  
(D002)

☐ 3. Reactive  
(D003)

☐ 4. Toxic  
(D000)

# XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature <i>Eugene R. Fluaharty</i>	Name and Official Title (type or print) Eugene R. Fluaharty	Date Signed 8/22/86
---	--	------------------------

RECEIVED  
PA SECTION  
OCT 8 1986  
EPA, P3

## HAZARDOUS WASTE PERMIT APPLICATION - PART A

RECEIVED  
Division of Solid Waste

AUG 25 1986

Please print or type in the unshaded areas only

## EPA I.D. NUMBER

A D 0 0 0 8 2 4 7 3 0

MANAGEMENT

## NAME OF FACILITY

USS Chemicals, Neville Island Plant

## FACILITY CONTACT

A. NAME &amp; TITLE (last, first, &amp; title)

B. PHONE (area code &amp; no.)

Eugene R. Fluharty, Plant Manager

4 1 2 7 7 8 3 3 0 3

## FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

Neville Island Plant

B. CITY OR TOWN

C. State D. Zip Code

Pittsburgh

P A 1 5 2 2 5

## FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

E. MUNICIPALITY

Neville Island Plant

Neville Township

B. CITY OR TOWN

C. State

D. Zip Code

F. COUNTY

Pittsburgh

P A 1 5 2 2 5

Allegheny

## I. SIC CODES (4-digit, in order of priority)

A. FIRST

C. THIRD

8 6 9 (specify) Plasticizers

2 8 6 5 (specify) Maleic Anhydride

B. SECOND

D. FOURTH

8 2 1 (specify) Polyester Resins

(specify)

## II. OPERATOR INFORMATION

A. NAME

B. Is the name listed in Item VII-A also the owner?  
☒ YES ☐ NO

USX Corporation

C. STREET OR P.O. BOX

600 Grant Street

D. CITY OR TOWN

E. State

F. Zip Code

G. PHONE (area code &amp; no.)

Pittsburgh

P A 1 5 2 3 0

4 1 2 4 3 3 1 1 2 1

H. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL  
S = STATE  
P = PRIVATE

M = PUBLIC (other than federal or state)  
O = OTHER (specify)

P (specify)

## III. EXISTING ENVIRONMENTAL PROGRAM PERMITS

NPDES (Discharges to Surface Water)

D. PSD (Air Emissions from Proposed Sources)

0 0 3 8 3 2

UIC (Underground Injection of Fluids)

E. SOLID WASTE

C. RCRA (Hazardous Wastes)

F. OTHER

(specify)

## IV. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and any well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area as per the instructions.

# X. NATURE OF BUSINESS (provide a brief description)

Manufacture of industrial organic chemicals specifically maleic anhydride, plasticizers and unsaturated polyester resins.

## XI. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Section I.

### A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

#### ☒ 1. EXISTING FACILITY

YR. MO. DAY  
7 9 0 7

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo. & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

#### ☐ 2. NEW FACILITY (Complete item below.)

YR. MO. DAY

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo. & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

### B. REVISED APPLICATION (place an "X" below and complete Section I)

#### ☐ 1. FACILITY HAS INTERIM STATUS

#### ☐ 2. FACILITY HAS A RCRA PERMIT

## XII. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item XII-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below may be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
STORAGE:			TREATMENT:		
Container (barrel, drum, etc.)	S01	Gallons or Liters	Tank	T01	Gallons Per Day or Liters Per Day
Waste Pile	S02	Gallons or Liters	Surface Impoundment	T02	Gallons Per Day or Liters Per Day
Surface Impoundment	S03	Cubic Yards or Cubic Meters	Incinerator	T03	Tons Per Hour or Metric Tons Per Hour; Gallons Per Hour or Liters Per Hour
	S04	Gallons or Liters			
DISPOSAL:			Other (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments, or incinerators. Describe the processes in the space provided (Item XII-C).)	T04	Gallons Per Day or Liters Per Day
Injection Well	D79	Gallons or Liters			
Landfill	D80	Acre-Feet (the volume that would cover one acre to a depth of one foot) or Hectare-Meter			
Land Application	D81	Acres or Hectares			
Ocean Disposal	D82	Gallons Per Day or Liters Per Day			
Surface Impoundment	D83	Gallons or Liters			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G	Liters Per Day	V	Acres	A
Liters	L	Tons Per Hour	D	Hectare-Meter	F
Cubic Yards	Y	Metric Tons Per Hour	W	Acres	B
Cubic Meters	C	Gallons Per Hour	E	Hectares	Q
Gallons Per Day	U	Liters Per Hour			

**EXAMPLE** FOR COMPLETING ITEM XII (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY		A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G			5			
X-2	T 0 3	20	E			6			
1	T 0 3	300	E			7			
2	S 0 2	15,000	G			8			
3						9			
4						10			

## XII. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

## XIII. DESCRIPTION OF HAZARDOUS WASTES

- A. HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 75.261(h) for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 75.261(h), enter the four-digit number(s) from 75.261(g) that describes the characteristics and/or the EP toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or EP toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS .....	P	KILOGRAMS .....	K
TONS .....	T	METRIC TONS .....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

### D. PROCESSES

#### 1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Section XII to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or EP toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Section XII to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous waste that possess the characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of item XIII-D(1); and (3) Enter in the space provided on page 5, the line number and the additional code(s).

#### 2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one Hazardous Waste Number shall be described on the form as follows:

- Select one of the Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE** FOR COMPLETING SECTION XIII (Shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of leaded tank bottoms from the petroleum refining industry. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES										
	1. PROCESS CODES (enter)						2. PROCESS DESCRIPTION (if a code is not entered in D(1))										
X-1	K	0	5	2	900	P	T	0	3	D	8	0					
X-2	D	0	0	2	400	P	T	0	3	D	8	0					
X-3	D	0	0	1	100	P	T	0	3	D	8	0					
X-4	D	0	0	2													"included with above"

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

XIII. DESCRIPTION OF HAZARDOUS WASTES (continued)														
LINE NO.	A. Hazard Waste No. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES							
	1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))					
1	D	0	0	1	150	T	S	0	2	T	0	3		This waste stream's characteristics
2	D	0	0	2										are ignitable and/or corrosive.
3														
4														
5														
6														
7														
8														
9														
10														
11														
12														
13														
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19														
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21														
22														
23														
24														
25														
26														

**III. DESCRIPTION OF HAZARDOUS WASTE (continued)**

USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM Q(1) ON PAGE 4.

**IV. FACILITY DRAWING**

All existing facilities must include in the space provided on page 6 a scale drawing of the facility (see instructions for more detail).

**V. PHOTOGRAPHS**

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas (see instructions for more detail).

**VI. FACILITY GEOGRAPHIC LOCATION**

LATITUDE (degrees, minutes, &amp; seconds)

4 0 3 0 0 0 0

LONGITUDE (degrees, minutes, &amp; seconds)

8 0 0 5 0 0 0

**VII. FACILITY OWNER**☒ A. If the facility owner is also the facility operator as listed in Section VII, place an "X" in the box to the left and skip to Section XVIII below.

B. If the facility owner is not the facility operator as listed in Section VII, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code &amp; no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

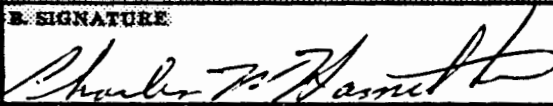
6. ZIP CODE

**XVIII. OWNER CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type) Charles W. Hamilton  
Senior V.P.-Chemicals &  
Specialty Products

B. SIGNATURE



C. DATE SIGNED

8/25/86

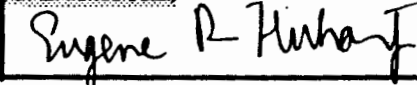
**XIX. OPERATOR CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

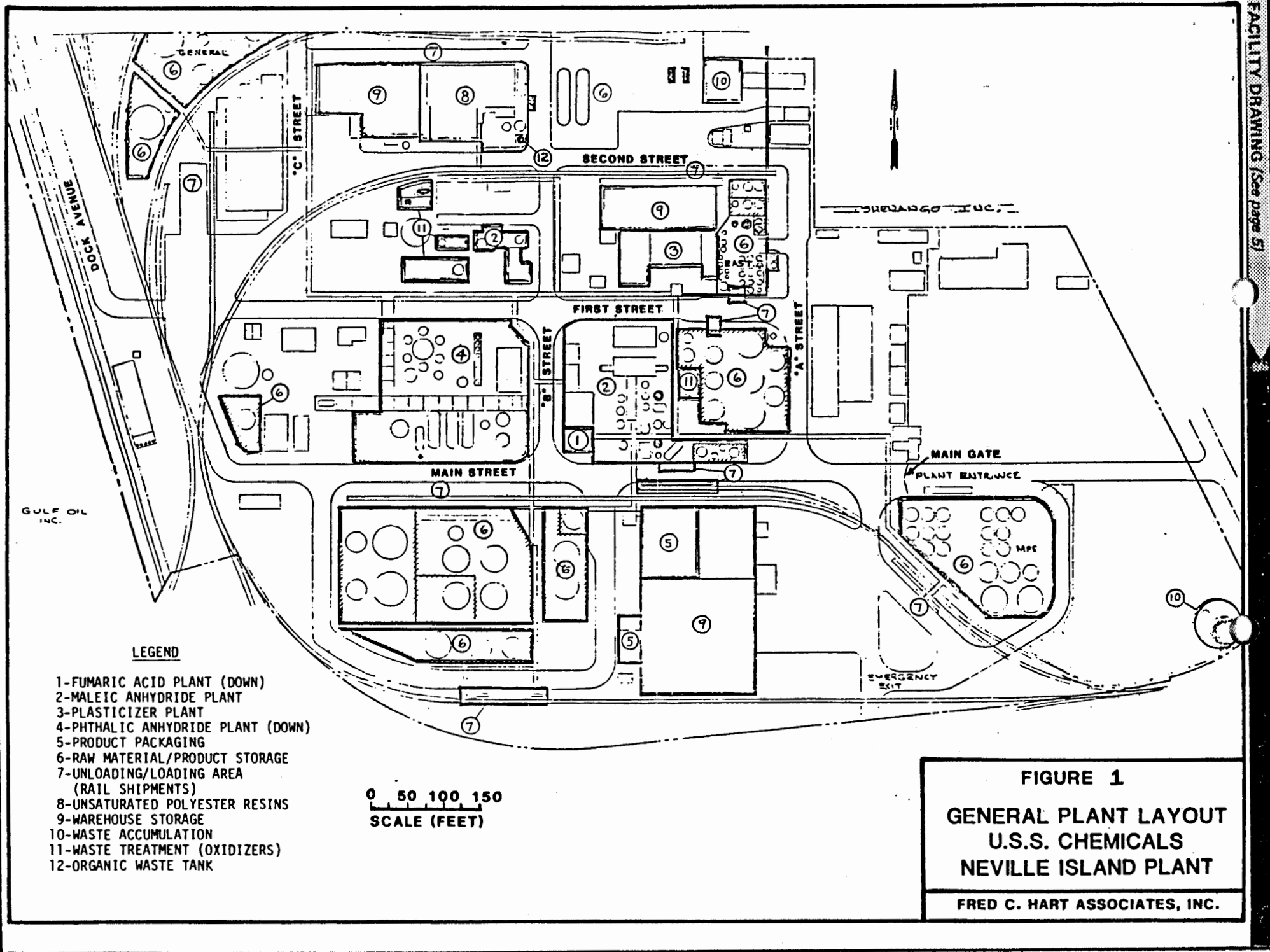
Eugene R. Fluhart

B. SIGNATURE



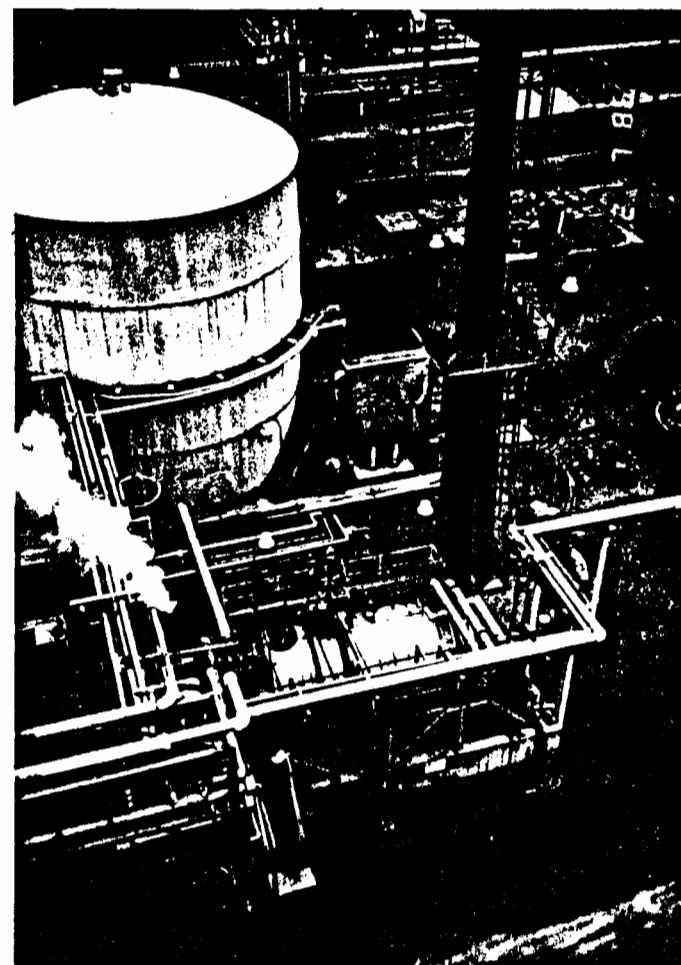
C. DATE SIGNED

8/22/86





**AQUEOUS WASTE STORAGE TANK**



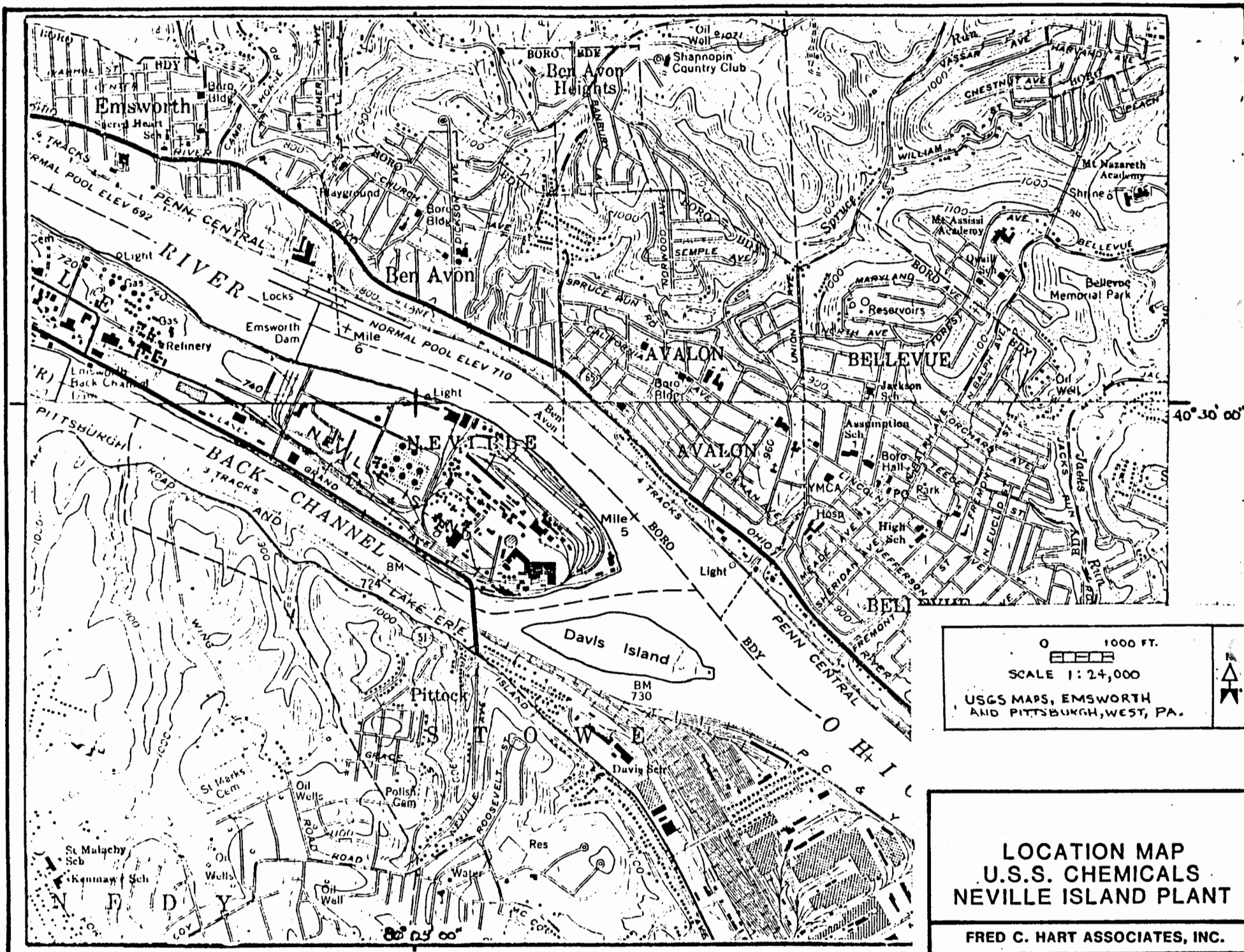
**STORAGE TANK-INCINERATOR SYSTEM**

**SECTION XV**

**POLYESTER RESIN WASTEWATER STORAGE AND INCINERATION SYSTEM**



**NEVILLE ISLAND  
PLANT**



Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

# Notification of Hazardous Waste Activity

### Comments

Per Mr Fluharty 15  
Office 12/1/86  
✓

ID — For Official Use Only																
C															T/A	C
W																1

# X. Description of Hazardous Wastes (continued from front)

**A. Hazardous Wastes from Nonspecific Sources.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 1	F 0 0 3				
7	8	9	10	11	12

**B. Hazardous Wastes from Specific Sources.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

**C. Commercial Chemical Product Hazardous Wastes.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U 1 5 1	U 1 9 0	U 1 4 7	U 0 6 9	U 0 2 8	
37	38	39	40	41	42
43	44	45	46	47	48

**D. Listed Infectious Wastes.** Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

**E. Characteristics of Nonlisted Hazardous Wastes.** Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☒ 1. Ignitable  
(D001)

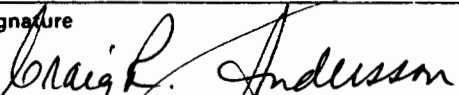
☒ 2. Corrosive  
(D002)

☐ 3. Reactive  
(D003)

☐ 4. Toxic  
(D000)

# XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature 	Name and Official Title (type or print) Craig R. Andersson Pres., Aristech Chemical Corp.	Date Signed 10/28/86
--	---	-------------------------

*file*

**USX**

NOV 17 1986

EPA, R3

United States Environmental Protection  
Agency  
Region III  
Waste Management Branch  
MS3HW34  
841 Chestnut Street  
Philadelphia, Pennsylvania 19107

November 13, 1986

Re: RCRA Permit Transfer  
EPA I.D. No. PAD000824730  
Neville Island Plant

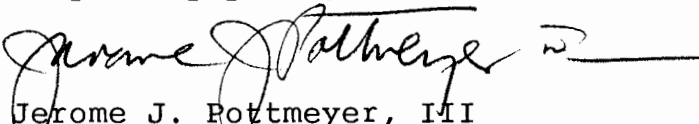
Dear Sir or Madam:

This letter is a request for the transfer of the  
above-referenced permit to a new corporate entity.

Aristech Chemical Corporation (Aristech) is a company newly  
formed by USX Corporation (USX). In approximately three to  
four weeks, USX plans to transfer to Aristech substantially all  
of the assets of its USS Chemicals Division, including the  
Neville Island Plant. Those permits that are transferrable  
will also be transferred to Aristech. USX will then sell its  
shares in Aristech to the investing public. After this  
transaction, USX will have no ownership interest in Aristech.

Accordingly, USX will be transferring the subject RCRA permit  
to Aristech Chemical Corporation. For your use, we have  
enclosed a signed original of the modified Part A permit for  
the Neville Island Plant.

Very truly yours,

  
Jerome J. Pottmeyer, III  
Attorney

JJP/jrh  
Enclosure

cc/we: Mr. Charles Duritsa (signed copy)  
Pennsylvania Department of Environmental Resources  
121 South Highland Avenue  
Pittsburgh, Pennsylvania 15206

## HAZARDOUS WASTE PERMIT APPLICATION - PART 1

Please print or type in the unshaded areas only

## I. EPA I.D. NUMBER

PA D 0 0 0 8 2 4 7 3 0

## II. NAME OF FACILITY

Aristech Chemical Corp.-Neville Island Plant

## III. FACILITY CONTACT

A. NAME &amp; TITLE (last, first, &amp; title)

Eugene R. Fluharty, Plant Manager

B. PHONE (area code &amp; no.)

4 1 2 7 7 8 3 3 0 3

## IV. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

Neville Island Plant

B. CITY OR TOWN

Pittsburgh

C. State D. Zip Code

PA 1 5 2 2 5

## V. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

Neville Island Plant

E. MUNICIPALITY

Neville Township

B. CITY OR TOWN

Pittsburgh

C. State

D. Zip Code

F. COUNTY

PA

1 5 2 2 5

Allegheny

## VI. SIC CODES (4-digit, in order of priority)

A. FIRST

2 8 6 9 (specify) Plasticizers

C. THIRD

2 8 6 5 (specify) Maleic Anhydride

B. SECOND

2 8 2 1 (specify) Polyester Resins

D. FOURTH

## VII. OPERATOR INFORMATION

A. NAME

Aristech Chemical Corporation

B. Is the name listed in  
Item VII-A also the  
owner?☒ YES ☐ NO

C. STREET OR P.O. BOX

600 Grant Street

D. CITY OR TOWN

Pittsburgh

E. State

F. Zip Code

G. PHONE (area code &amp; no.)

PA

1 5 2 1 9

4 1 2 4 3 3 1 1 2 1

H. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL

M = PUBLIC (other than federal or state)

S = STATE

O = OTHER (specify)

P = PRIVATE

P (specify)

## VIII. EXISTING ENVIRONMENTAL PROGRAM PERMITS

A. NPDES (Discharges to Surface Water)

0 0 0 3 8 3 2

D. PSD (Air Emissions from Proposed Sources)

B. UIC (Underground Injection of Fluids)

E. SOLID WASTE

C. RCRA (Hazardous Wastes)

F. OTHER

(specify)

## IX. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the location of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and any well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area as per the instructions.

# **X. NATURE OF BUSINESS (provide description)**

Manufacture of industrial organic chemicals specifically maleic anhydride, plasticizers and unsaturated polyester resins.

## **XI. FIRST OR REVISED APPLICATION**

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Section I.

**A. FIRST APPLICATION** (place an "X" below and provide the appropriate date)

☒ **1. EXISTING FACILITY**

☐ **2. NEW FACILITY** (Complete item below.)

YR. MO. DAY  
7 9 0 7

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo. & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR. MO. DAY

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo. & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

**B. REVISED APPLICATION** (place an "X" below and complete Section I)

☐ **1. FACILITY HAS INTERIM STATUS**

☐ **2. FACILITY HAS A RCRA PERMIT**

## **XII. PROCESSES - CODES AND DESIGN CAPACITIES**

**A. PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item XII-C).

**B. PROCESS DESIGN CAPACITY** - For each code entered in column A enter the capacity of the process.

1. **AMOUNT** - Enter the amount.

2. **UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below may be used.

PROCESS	PROCESS CODE	APPROPRIATE UNIT OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>STORAGE:</b>			<b>TREATMENT:</b>		
Container (barrel, drum, etc.)	S01	Gallons or Liters	Tank	T01	Gallons Per Day or Liters Per Day
Tank	S02	Gallons or Liters	Surface Impoundment	T02	Gallons Per Day or Liters Per Day
Waste Pile	S03	Cubic Yards or Cubic Meters	Incinerator	T03	Tons Per Hour or Metric Tons Per Hour; Gallons Per Hour or Liters Per Hour
Surface Impoundment	S04	Gallons or Liters	Other (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments, or incinerators. Describe the processes in the space provided (Item XII-C).)	T04	Gallons Per Day or Liters Per Day
<b>DEAL:</b>					
Open Well	D79	Gallons or Liters			
Well	D80	Acres-Foot (the volume that would cover one acre to a depth of one foot) or Hectare-Meter			
Land Application	D81	Acres or Hectares			
Ocean Disposal	D82	Gallons Per Day or Liters Per Day			
Surface Impoundment	D83	Gallons or Liters			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G	Liters Per Day	V	Acres-Foot	A
Liters	L	Tons Per Hour	D	Hectare-Meter	F
Cubic Yards	Y	Metric Tons Per Hour	W	Acres	B
Cubic Meters	C	Gallons Per Hour	E	Hectares	Q
Gallons Per Day	U	Liters Per Hour			

**EXAMPLE** FOR COMPLETING ITEM XII (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

	A. PROCESS CODE (from list above)			B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY		A. PROCESS CODE (from list above)			B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
				1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)						1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S	0	2	200	G			5					
X-2	T	0	3	20	E			6					
1	T	0	3	300	E			7					
	S	0	2	15,000	G			8					
3								9					
4								10					

XIII. DESCRIPTION OF HAZARDOUS WASTES

- A. HAZARDOUS WASTE NUMBER - Enter the four-digit number from 75.261(h) for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 75.261(h), enter the four-digit number from 75.261(g) that describes the characteristics and/or the EF toxic constituents of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or EF toxic constituent entered in column A estimate the total annual quantity of all the non-listed wastes that will be handled which possess that characteristic or constituent.
- C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE		METRIC UNIT OF MEASURE	
CODE	POUNDS	CODE	KILOGRAMS
	..... T		..... K
	..... TONS		..... M
	..... T		..... METRIC TONS

- D. PROCESSES
1. PROCESSES CODES: For listed hazardous wastes: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Section XII to indicate how the waste will be stored, treated, and/or disposed of at the facility. For non-listed hazardous wastes: For each characteristic or EF toxic constituent entered in column A, select the code(s) from the list of process codes contained in Section XII to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess the characteristic or toxic constituent.
2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one Hazardous Waste Number shall be described on the form as follows:

- Select one of the Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
- Repeat step 2 for each other Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING SECTION XIII (shown in the numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 300 pounds per year of leached tank bottoms from the petroleum refining industry. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Hazardous Waste No. (enter code)	Estimated Annual Quantity of Waste (enter code)	C. Unit of Measure (enter code)	1. Process Codes (enter)		2. Process Description (if a code is not entered in D(1))	
X-1	K 0 5 2	P	T 0 3	D 8 0		
		P	T 0 3	D 8 0		
	D 0 0 2	P	T 0 3	D 8 0		
X-3	D 0 0 1	P	T 0 3	D 8 0		
X-4	D 0 0 2					"Included with above"

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

XIII. DESCRIPTION OF HAZARDOUS WASTES (continued)														
1	A. Hazard Waste No. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES							
	1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))					
1	D	0	0	1	1500	T	S	D	2	T	0	3		This waste stream's characteristic
2	D	0	0	2										are ignitable and/or corrosive.
3														
4														
5														
6														
7														
8														
9														
10														
11														
12														
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24														
25														
26														

**XIII. DESCRIPTION OF HAZARDOUS WASTE (continued)**

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 4.

**XIV. FACILITY DRAWING**

All existing facilities must include in the space provided on page 6 a scale drawing of the facility (see instructions for more detail).

**XV. PHOTOGRAPHS**

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas (see instructions for more detail).

**XVI. FACILITY GEOGRAPHIC LOCATION**

LATITUDE (degrees, minutes, &amp; seconds)

4030000

LONGITUDE (degrees, minutes, &amp; seconds)

8005000

**XVII. FACILITY OWNER**

A. If the facility owner is also the facility operator as listed in Section VII, place an "X" in the box to the left and skip to Section XVIII below.

B. If the facility owner is not the facility operator as listed in Section VII, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code &amp; no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

**XVIII. OWNER CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type) Charles W. Hamilton  
Senior V.P.-Chemicals &  
Specialty Products

B. SIGNATURE



C. DATE SIGNED

11/13/86

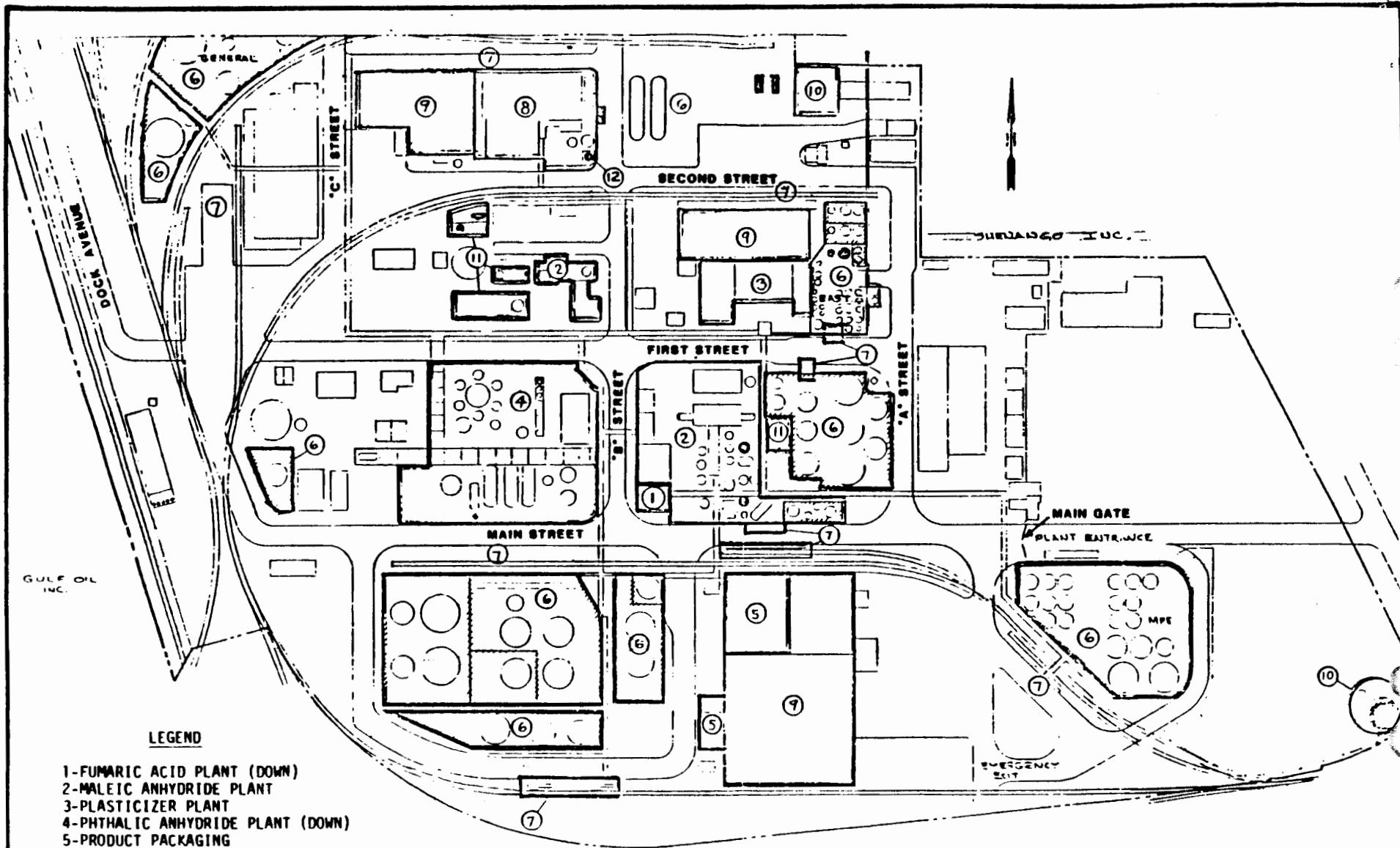
**XIX. OPERATOR CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED



**LEGEND**

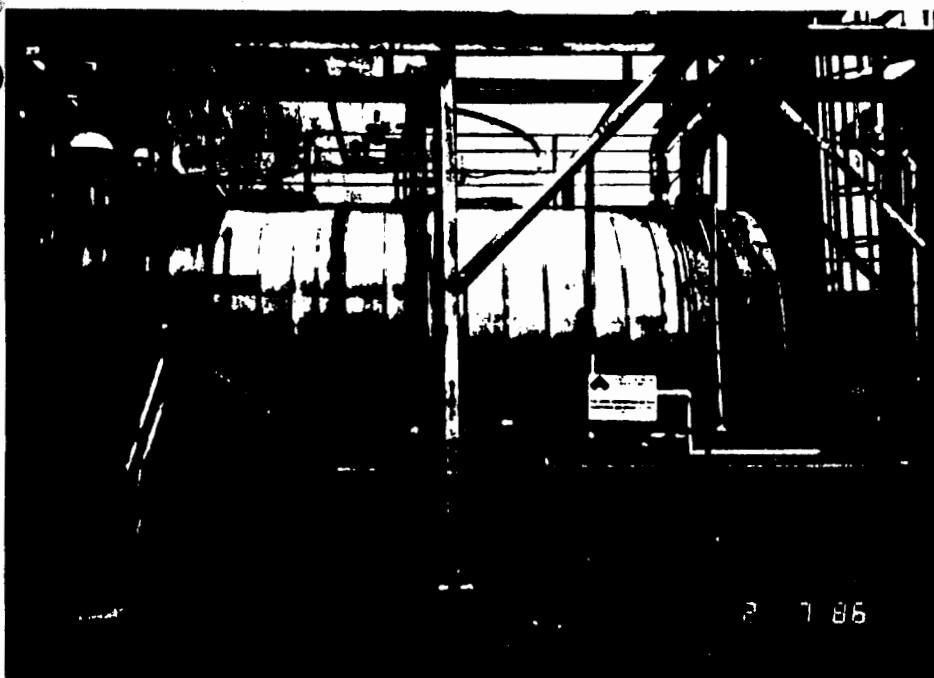
- 1-FUMARIC ACID PLANT (DOWN)
- 2-MALEIC ANHYDRIDE PLANT
- 3-PLASTICIZER PLANT
- 4-PHTHALIC ANHYDRIDE PLANT (DOWN)
- 5-PRODUCT PACKAGING
- 6-RAW MATERIAL/PRODUCT STORAGE
- 7-UNLOADING/LOADING AREA  
(RAIL SHIPMENTS)
- 8-UNSATURATED POLYESTER RESINS
- 9-WAREHOUSE STORAGE
- 10-WASTE ACCUMULATION
- 11-WASTE TREATMENT (OXIDIZERS)
- 12-ORGANIC WASTE TANK

0 50 100 150  
SCALE (FEET)

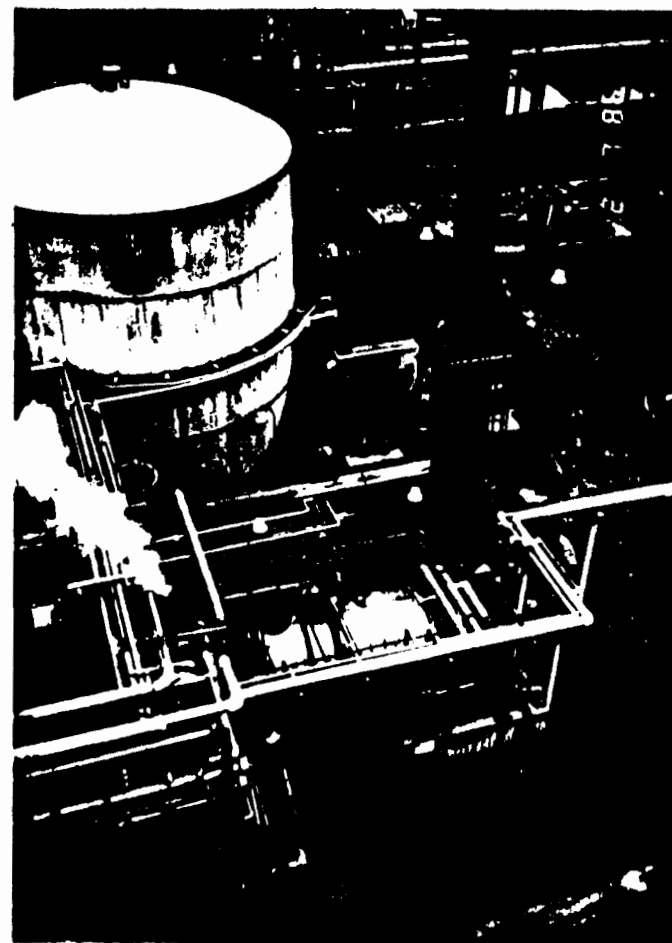
**FIGURE 1**

**GENERAL PLANT LAYOUT  
U.S. CHEMICALS  
NEVILLE ISLAND PLANT**

**FRED C. HART ASSOCIATES, INC.**



**AQUEOUS WASTE STORAGE TANK**



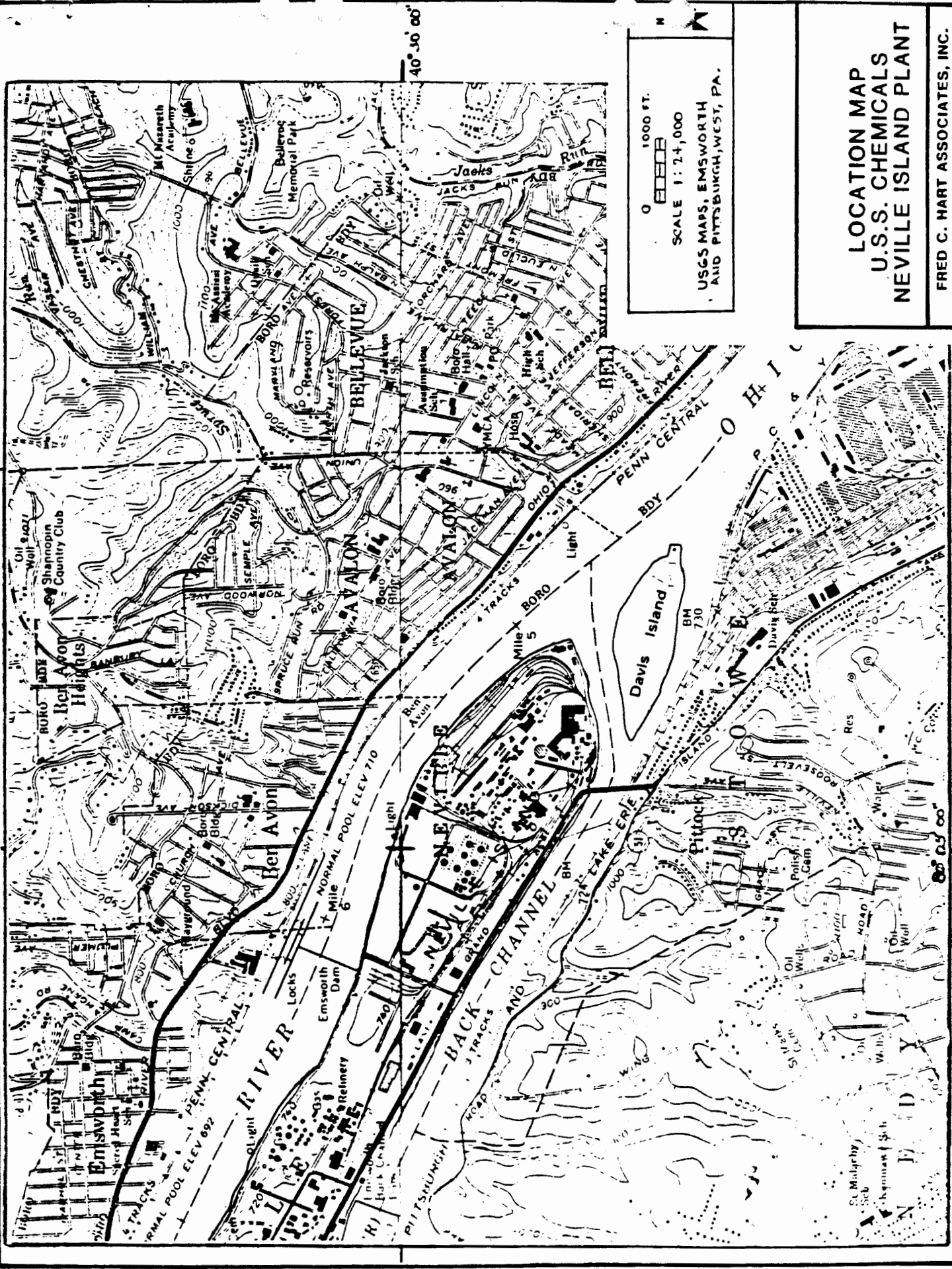
**STORAGE TANK-INCINERATOR SYSTEM**

**SECTION XV**

**POLYESTER RESIN WASTEWATER STORAGE AND INCINERATION SYSTEM**



**NEVILLE ISLAND  
PLANT**



LOCATION MAP  
U.S.S. CHEMICALS  
NEVILLE ISLAND PLANT  
FRED C. HART ASSOCIATES, INC.